

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

GROUPON, INC.

Plaintiff,

v.

SUNG SHIN,

Defendant.

)  
) Case No. 1:21-cv-06082  
)  
) Honorable Judge Charles P. Kocoras  
)  
) **DEFENDANT’S WITNESS AND**  
) **EXHIBIT LIST**  
)  
) **Preliminary Injunction Hearing**  
) **Date: December 14, 2021**  
) **Time: 11 am CT**

COMES NOW defendant Sung Shin, by and through his attorneys of record, and submits the following list of witnesses and exhibits to be presented during the preliminary injunction hearing set for December 14, 2021.

**I. WITNESSES**

1. Sung Shin, Defendant
2. Vivek Patel, Chief Product Officer of Yelp Inc.

**II. EXHIBITS**

No.	Description	Bates Number
1	Shin Resume	PLAINTIFF 00001-00003
2	Groupon’s Job Description	PLAINTIFF 00025-00042
3	Sung Shin Email dated 2/21/2021 with attached Business Plan	PLAINTIFF 03043-03049
4	Groupon Offer Letter	
5	Groupon Confidentiality, Intellectual Property and Restrictive Covenants Agreement	
6	July 2021 Emails about Reach Extension	
7	Groupon Email to Shin with Return of Equipment	DEF-000316

No.	Description	Bates Number
	Label	
8	Groupon Return Equipment Shipping Label	DEF-000317
9	Groupon's Answers and Objections to Defendant's Request for Production of Documents and Other Tangible Things, and Interrogatories	
10	Defendant's Notice of Videotaped Deposition to Plaintiff Groupon, Inc., Under FRCP 30(b)(6) Via Zoom	
11	Yelp Job Description, Vice President of Enterprise Product	DEF000008000011
12	Yelp Offer Letter	DEF-000113-000118
13	November 10, 2021 Letter from Sung Shin to Groupon regarding Noncompete	
14	Shin Wire Transfer Repaying Bonus	DEF-000315
15	Yelp's Confidential In-Progress Multi-Loc Planning Document 2022	CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER – ATTORNEYS EYES ONLY YLP002582-002609
16	Yelp Trust & Safety Report 2020	
17	Yelp Multi-Location Survey: December 2020 February 2021	CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER – ATTORNEYS EYES ONLY YLP001930-002000
18	Groupon – Goods Section	
19	Amazon – Bose Headphones on Amazon Choice	
20	Amazon – Bose Headphones	
21	Amazon – Ratings and Reviews for Bose Earbuds	
22	Amazon – Sponsored Ad to purchase Maine Lobster delivery	
23	Groupon – Ad for Maine Lobster	
24	Groupon – Sponsored Ads for Bedding	

No.	Description	Bates Number
25	Amazon – Sponsored Ads Bedding	
26	Amazon – Sponsored Banners on Amazon for Earbuds	
27	Amazon – Amazon Coupons	
28	Amazon – Epic Daily Deals Banner	
29	Amazon – Gift Cards	
30	Amazon – Food and Grocery Items	
31	Amazon – Starbucks Gift Cards	
32	Amazon – Vertical Department – Beauty and Personal Care Items	
33	Yelp Pizza Slide Comparison	
34	Report on Competitive Assessment, by Utpal M. Dholakia, December 9, 2021	
35	Declaration of Cristy Caldwell	
36	Declaration of Rahul Hampole	
37	Declaration of Sung Shin	
38	Q2 2018 Familiarity Study, Groupon	CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER – ATTORNEY’S EYES ONLY PLAINTIFF 01462-01495
39	Yelp Multi-Loc Demonstrative	

Respectfully submitted this 13<sup>th</sup> day of December, 2021.

/s/ Jeffrey L. Taren

Jeffrey L. Taren, Illinois Bar #2796821

Jesse Wing, Illinois Bar #90784355

MacDONALD HOAGUE & BAYLESS

705 Second Avenue, Suite 1500

Seattle, WA 98104

Phone: (206) 622-1604

Email: [jeffreyt@mhb.com](mailto:jeffreyt@mhb.com)

[jessew@mhb.com](mailto:jessew@mhb.com)

*Attorneys for Defendant Sung Shin*